

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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In re:

CHRISTIAN G. MONNE

Debtors.

Case No. 23-10870 (JKS)

Chapter 13

Judge: Hon. John K. Sherwood

Hearing Date: April 13, 2023

Hearing Time: 8:30 a.m.

**OBJECTION OF AGSCO CORPORATION TO CONFIRMATION OF DEBTOR'S MODIFIED  
PLAN**

Creditor, AGSCO Corporation ("**AGSCO**") by and through his undersigned attorneys, respectfully submits this objection to Christian G. Monne's (the "**Debtor**") proposed Chapter 13 Plan (the "**Plan**") and respectfully states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 1, 2023.
2. AGSCO filed a proof of claim on February 10, 2023 in the amount of \$200,000.00 regarding a certain settlement agreement which was entered in the United States District Court for the District of New Jersey captioned AGSCO Corporation v. Christian Monne (Case No. 21-12530.)
3. The Debtor filed a Chapter 13 Plan on February 22, 2023 (ECF No. 11).

4. Despite AGSCO's proof of claim, the Debtor's Plan proposes to pay AGSCO on a total claim amount of \$103,000.00.

5. As such, the Plan is not in compliance with 11 U.S.C. §§1322 and cannot be confirmed.

6. AGSCO reserves all rights to amend and/or modify its proof of claim as it deems appropriate.

**WHEREFORE**, AGSCO respectfully requests the entry of an Order which denies confirmation of the Plan, as currently postured, and for such other and further relief as the Court may deem just and proper.

S. MITNICK LAW, PC  
*Attorneys for Creditor,*  
*AGSCO, Inc.*

By: /s/ Marc D. Miceli  
MRAC D. MICELI

Dated: April 6, 2023